

July 6, 2017

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 10-90
Hamilton County Telephone Co-op
Ex Parte Letter**

Dear Ms. Dortch:

In April, Hamilton County Telephone Co-op (“Hamilton” or the “Cooperative”) conducted *ex parte* meetings with wireline legal advisors of Chairman Pai and Commissioners Clyburn and O’Rielly to discuss possible future funding opportunities.¹ As explained in the Hamilton *Ex Parte*, eighty-five percent of the locations for which funding had been projected in the Alternative Connect America Cost Model (“A-CAM”) was eliminated due to a fixed wireless provider’s widespread claim of coverage in its flawed Form 477 data and an ineffective challenge process, significantly reducing Hamilton’s A-CAM support by \$2,852,324.² In the meetings, Hamilton discussed possible future funding opportunities and urged the Federal Communications Commission (“FCC” or “Commission”) to fully fund the A-CAM as well as provide funding for the locations for which funding was eliminated.

In *ex parte* meetings in June, a group of companies (known as the “Affected Companies”) conducted *ex parte* meetings in which they too discussed future funding opportunities and urged the FCC to fully fund the A-CAM and make additional funding to address, in their case, situations where A-CAM funding was not allocated due to clerical oversights.³ In the Affected Companies *Ex Partes*, the companies estimated that \$8,649,816 would be needed in additional funding to address these situations.⁴ In the presentations, the Affected Companies also demonstrated that providing the additional funding would induce broadband deployment in a “highly efficient” way.⁵

Hamilton hereby also demonstrates that allocating funding to address the eighty-five percent of the locations for which funding was eliminated for Hamilton would be an efficient means to deploy broadband. Using a similar analysis as the one provided in the Affected Companies *Ex Partes*, Hamilton

¹ See Letter from John Kuykendall, Vice President, JSI to Marlene H. Dortch, Secretary, FCC, WC Docket No. 10-90 (filed April 28, 2017) (“Hamilton *Ex Parte*”).

² *Id.* at 1 & Attachment p.4.

³ See Letters from Dustin Johnson, Vice President of Consulting, Vantage Point Solutions to Marlene H. Dortch, Secretary, FCC, WC Docket No. 10-90 (filed June 15, 2017 and June 29, 2017) (“Affected Companies *Ex Partes*”).

⁴ *Id.* at 6.

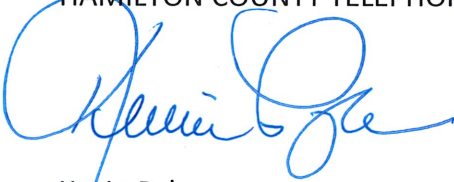
⁵ *Id.* at 6-8. In support of this assertion, the Affected Companies calculated the annual cost per prescribed location associated with fully funding the A-CAM to be \$2,182 and compared that with the cost per location for funding the Affected Companies which was calculated to be \$586.

estimates that the annual cost per location associated with the additional funding is \$1,331 as compared to the \$2,182 annual cost per location for fully funding the A-CAM.

In conclusion, Hamilton joins with the Affected Companies in urging the FCC to provide additional funding in the amount of \$113,254,616 in order to fully fund the A-CAM and to provide additional funding to address the eighty-five percent of the locations for which funding was eliminated for Hamilton and to address situations where funding was not allocated due to clerical oversights.⁶

Sincerely,

HAMILTON COUNTY TELEPHONE CO-OP

A handwritten signature in blue ink, appearing to read "Kevin Pyle", is written over the printed name and title.

Kevin Pyle
GM/EVP

⁶ This amount includes \$101,752,476 which is provided in the Affected Companies *Ex Partes* as the amount needed to fully fund the A-CAM plus \$8,649,816 in additional funding for the Affected Companies plus \$2,852,324 in additional funding for Hamilton.